Cover Letter

Dear Sir/Madam,

Please find the NOC for the PMN identified by the EPA Case Number P-18-0224.

If there are any questions regarding this NOC, please contact our technical contact Saadia Eltayeb at 202-828-8965.

Sincerely,



U.S. Environmental Protection Age NOTICE OF COMMENCEMENT MANUFACTURE OR IMPORT				Report Number			
	SUBMITTER IDENTIFICATION		Document Control #:				
.,	Name of Authorized Official		Mailing Ad	ldress (number	and street)	CDI*	
Manu- facturer/	(first) (last)					— CBI*	
Importer (in U.S.)	Company Name		City	State	Zip		
(/						X	
Technical	Name		Telep	hone Number			
Contact (in U.S.)	(first) (last) Saadia Eltayeb	2028	3288965				
Part II - I	Premanufacture Notice (PMN) "P" Case			P-18-0224	•		
Part III -	Check the appropriate box and provide	the exa	act date of manu				
	First Commercial Manufacture**	Χ					
Date:		Date:	12/13/2018		·		
	mmencement is the date of completion of non-exempt manufa tees, the date of commencement is the date that the new che						
Part IV -	Manufacturing Plant Site(s) or Importing	g Site(s	S): (Importers, provi	de street addre	ess of destination)		
						Х	
Part V - Specific Chemical Identity: (For Consolidated submissions, each substance must have a separate NOC form with the specific identity of each chemical substance.)							
Chemical Na	ame:					X	
Part VI -	Generic Chemical Name (if chemical identity	is claime	d CBI*):				
Alkenoic aci	d, polymer with alkenylcarbomonocycle, [alkanediylbi	s(substitu	ıtedalkylene)] bis[hete	eromonocycle] a	and (alkylalkenyl) aromatic,	salt,	



CBI SUBMISSION

Part VII - Substance Identity Confidentiality Status:				
Х	I wish to continue to claim the substance identity confidential and the substantiation to support this claim is attached. Failure to submit the required substantiation in accordance with 40 CFR 720.85(b) will result in a waiver of your claim.			
	I previously claimed the substance identity as confidential and hereby relinquish that claim.			
	I did not claim the substance identity as confidential in my original PMN submission.			

The public reporting and recordkeeping burden for this collection of information is estimated to average 0.8 hours per response. Send comments on the Agency's need for this information, the accuracy of the provided burden estimates, and any suggested methods for minimizing respondent burden, including through the use of automated collection techniques to the Director, Collection Strategies Division, U.S. Environmental Protection Agency (2822T), 1200 Pennsylvania Ave., NW, Washington, D.C. 20460. Include the OMB control number in any correspondence. Do not send the completed EPA Form 7710-56 to this address.

You must submit your completed notice no later than 30 calendar days after the first date of commercial manufacture/importation to the address shown below:

U.S. Environmental Protection Agency OPPT Document Control Office (7407M) 1200 Pennsylvania Ave., NW Washington, D.C. 20460 ATTN: Notice of Commencement

I hereby certify to the best of my knowledge and belief that all information entered on this form is complete and accurate. I further certify that, pursuant to 15 U.S.C. § 2613(c), for all claims for protection for any confidential information made with this submission, all information submitted to substantiate such claims is true and correct, and that it is true and correct that the person submitting the claim has:

- (i) taken reasonable measures to protect the confidentiality of the information;
- (ii) determined that the information is not required to be disclosed or otherwise made available to the public under any other Federal law:
- (iii) a reasonable basis to conclude that disclosure of the information is likely to cause substantial harm to the competitive position of the person; and
- (iv) a reasonable basis to believe that the information is not readily discoverable through reverse engineering.

Any knowing and willful misrepresentation is subject to criminal penalty pursuant to 18 U.S.C. § 1001.

Signature of authorized official]	Date	01/09/2019
Note: CBI* - refers to the term "Confidential Business Information". Mark (X) in the box if the information is to be held Confidential.				

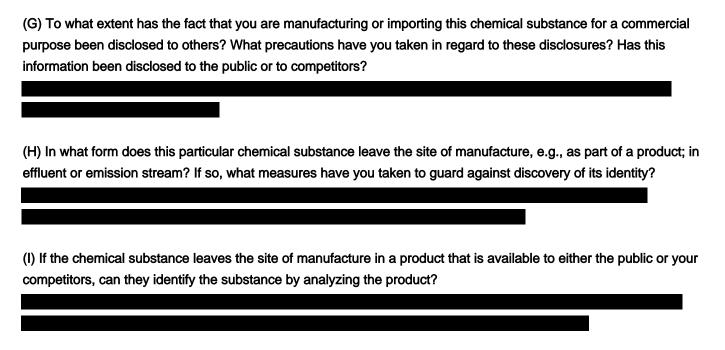
EPA Form 7710-56 (6-09)



CBI Substantiation

(A) What harmful effects to your competitive position, if any, do you think would result if EPA publishes on the Inventory the identity of the chemical substance? How could a competitor use such information given the fact that the identity of the substance otherwise would appear on the Inventory of chemical substances with no link between the substance and your company or industry? How substantial would the harmful effects of disclosure be? What is the causal relationship between the disclosure and the harmful effects?
the causal relationship between the disclosure and the narmidi effects:
(B) For what period of time should confidential treatment be given? Until a specific date, the occurrence of a specific event, or permanently? Why?
(C) Has the chemical substance been patented? If so, have you granted licenses to others with respect to the patent as it applies to the chemical substance? If the chemical substance has been patented and therefore disclosed through the patent, why should it be treated as confidential for purposes of the Inventory?
(D) Has the identity of the chemical substance been kept confidential to the extent that your competitors do not know it is being manufactured or imported for a commercial purpose by anyone?
(E) Is the fact that someone is manufacturing or importing this chemical substance for commercial purposes available to the public, e.g. in technical journals or other publications; in libraries; or in State, local, or Federal agency public files?
(F) What measures have you taken to prevent undesired disclosure of the fact that you are manufacturing or importing this substance for a commercial purpose?





(K) Has EPA, another Federal agency, or any Federal court made any persistent confidentiality determinations regarding this chemical substance? If so, copies of such determinations must be included in the substantiation.

(J) For what purpose do you manufacture or import the substance?

(L) If the notice includes a health and safety study concerning the new chemical substance, the submitter must also answer the questions in 40 CFR 720.90(b)(2). (Persons must answer this question if a health and safety study was provided at any time in the new chemical process.)